

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

2020 DEC -1 P 1:17

UNITED STATES OF AMERICA,

CLERK OF COURT

Plaintiff,

Case No. 20-CR-

20-CR-222

v.

[18 U.S.C. §§ 2251(a), 1591(a)(1), (b)(2)
& (c)]

DARRYL K. GREEN,
a/k/a "MAC,"

Green Bay Division

Defendant.

INDICTMENT

COUNT ONE

(Production of Child Pornography)

THE GRAND JURY CHARGES THAT:

On or about June 17, 2020, in the State and Eastern District of Wisconsin,

**DARRYL K. GREEN,
a/k/a "MAC,"**

knowingly employed, used, persuaded, induced, enticed and coerced Jane Doe, a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: a visual depiction of Jane Doe, engaged in the lascivious exhibition of her genitals, which visual depiction was produced using materials that had been mailed, shipped, transported across state lines and in foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

COUNT TWO

(Sex Trafficking of a Child)

THE GRAND JURY FURTHER CHARGES THAT:

Beginning in approximately April 2020, and continuing until approximately July 13, 2020,
in the State and Eastern District of Wisconsin, and elsewhere,

**DARRYL K. GREEN,
a/k/a "MAC,"**

in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide,
obtain, maintain, and solicit Jane Doe, having had a reasonable opportunity to observe Jane Doe,
and knowing and in reckless disregard of the fact that Jane Doe had not attained the age of 18 years
and would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c).

FORFEITURE NOTICE

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 2251(a), as set forth in Count One of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all visual depictions described in Title 18, Sections 2252 and 2256, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2252, and shall forfeit any property, real or personal, used or intended to be used to commit or promote the commission of such offense.

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1591, set forth in Count Two of this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 1594(e)(1), any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the offense, and any property traceable to such property, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense. The property to be forfeited includes, but is not limited to, a sum of money equal to the proceeds obtained from the offense or offenses of conviction.

3. If any of the property described in paragraph 2 above, as a result of any act or omission by a defendant cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be

entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL:

[REDACTED]

FOREPERSON

Dated: December 1, 2020



MATTHEW D. KRUEGER
United States Attorney